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July 1, 2015

**BY ECF**

Hon. Richard M. Berman  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 17B  
New York, New York 10007

**JPMorgan Chase Bank, N.A. v. Freyberg**  
**Case No. 14 CV 6851 (RMB)**

Dear Judge Berman:

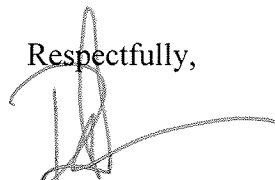
We are counsel to plaintiff JPMorgan Chase Bank, N.A. ("Chase"). We write to request a one week extension of the summary judgment briefing schedule previously issued by this Court. At a conference on April 13, 2015, this Court permitted Chase to make a motion for summary judgment and entered a briefing schedule by which Chase was to file its motion on May 13, 2015, defendant was to file opposition and any cross-motion on June 15, 2015, Chase was to file its reply on June 29, 2015, and defendant was to file his sur-reply on July 13, 2015. Following a conference on April 29, 2015, Magistrate Judge Netburn extended each deadline by two weeks to permit the parties to engage in settlement discussions.

Consistent with the revised briefing schedule, on May 27, 2015, Chase made its motion for summary judgment [ECF No. 47]. At or about the close of business on June 29, defendant filed opposition and a cross motion [ECF No. 54]. In light of attorney vacation schedules and the intervening holiday weekend, we are constrained to seek a modest extension of the briefing schedule to file a reply.

We discussed our request with defendant's counsel and he consents upon condition defendant's time to file a sur-reply is likewise extended one week. Accordingly, we write to request the Court approve an extension from July 13, 2015 to July 20, 2015 for Chase to file its reply, and from August 3, 2015 to August 10, 2015 for defendant to file a sur-reply. Chase has not previously requested an extension of the briefing schedule.

We thank the Court for its courtesy.

Respectfully,



Bruce S. Goodman

cc: David S.J. Neufeld, Esq. (by ECF)